Federal Aviation Administration
Aviation Rulemaking Advisory Committee

January 31, 2002

Re: 145.59 Ratings and Classes

I find the FAA's proposed changes to the Part 145 ratings and classes to be appropriate and concur with the FAA's explanation for the changes with the following exceptions;

Powerplant Rating
Although the APU is not used for propulsion, APU's based on gas turbine technology are designed to provide pneumatic and electrical power, and should be classified as powerplants rather than accessories. Similar to other Powerplants, APU's also have an accessory gearbox housing components such as generators, oil pumps, fuel pumps, starter motor's, etc. that should be appropriately classified as accessories.

Avionics Rating
Computer Systems, to include Aircraft, Avionics and Powerplant should be classified under the Avionics Rating rather than a separate rating for Computers. Although their may be differences with some Computers the technology should be similar not requiring separate classifications for Aircraft, Avionics and Powerplant Computers.

CURRENT RATING	PROPOSED RATING
Airframe Rating	**Aircraft Rating**
Class 1: Composite construction of small aircraft.	Class 6: Aircraft composed primarily of composite material, of 12,500 pounds maximum certificated takeoff weight or less.
Class 2: Composite construction of large aircraft.	Class 7: Aircraft composed primarily of composite material, over 12,500 pounds maximum certificated takeoff weight.
Class 3: All-metal construction of small aircraft.	Class 1: Aircraft (other than rotorcraft and aircraft composed primarily of composite material) of 12,500 pounds maximum certificated takeoff weight or less.
	Class 4: Rotorcraft (other than rotorcraft composed primarily of composite material) of 6,000 pounds maximum certificated takeoff weight or less.
	Class 5: Rotorcraft (other than rotorcraft composed primarily of composite material) over 6,000 pounds maximum certificated takeoff weight.
Class 4: All-metal construction of large aircraft.	Class 2: Aircraft (other than rotorcraft and aircraft composed primarily of composite material) over 12,500 pounds maximum certificated takeoff weight and up to, and including, 75,000 pounds maximum certificated takeoff weight.

Attachment 3

CURRENT RATING	PROPOSED RATING
	Class 3: Aircraft, by make and model, (other than rotorcraft and aircraft composed primarily of composite material) over 75,000 pounds maximum certificated takeoff weight.
Powerplant Rating	**Powerplant Rating**
Class 1: Reciprocating engines of 400 horsepower or less.	Class 1: Reciprocating engines.
Class 2: Reciprocating engines of more than 400 horsepower.	Class 1: Reciprocating engines.
Class 3: Turbine engines.	Class 2: Turbopropeller and turboshaft engines.
	Class 3: Turbojet and turbofan engines.
	Class 4: Auxiliary power units (APUs) that may be installed on aircraft as self-contained units to supplement the aircraft's engines as a source of hydraulic, pneumatic, or electrical power.
Propeller Rating	**Propeller Rating**
Class 1: All fixed-pitch and ground-adjustable propellers of wood, metal, or composite construction.	Class 1: Fixed-pitch and ground-adjustable propellers.
Class 2: All other propellers, by make.	Class 2: Variable-pitch propellers.
Radio Rating	**Avionics Rating**
Class 1: Communication equipment.	Class 1: Communication equipment.
Class 2: Navigational equipment.	Class 2: Navigational equipment.
Class 3: Radar equipment.	Class 3: Pulsed equipment.
No Equivalent Current Rating	Class 3; Computer Systems to include Aircraft, Powerplant and Avionics.
Instrument Rating	**Instrument Rating**
Class 1: Mechanical.	Class 1: Mechanical.
Class 2: Electrical.	Class 2: Electrical.
Class 3: Gyroscopic.	Class 3: Gyroscopic.
Class 4: Electronic.	Class 4: Electronic.
Accessory Rating	**Accessory Rating**
Class 1: Mechanical accessories that depend on friction, hydraulics, mechanical linkage, or pneumatic pressure for operation, including aircraft wheel brakes, mechanically driven pumps, carburetors, aircraft wheel assemblies, shock absorber struts, and hydraulic servo units.	Class 1: Mechanical accessories that depend on friction, hydraulics, mechanical linkage, or pneumatic pressure for operation.

CURRENT RATING	PROPOSED RATING
Class 2: Electrical accessories that depend on electrical energy for their operation, and generators, including starters, voltage regulators, electric motors, or similar electrical accessories.	Class 2: Electrical accessories that depend on or produce electrical energy.
Class 3: Electronic accessories that depend on an electron tube, transistor, or similar device, including supercharger, temperature, air conditioning controls, or similar electronic controls.	Class 3: Electronic accessories that depend on transistors; lasers; fiber optics; solid-state, integrated circuits; vacuum tubes; or similar devices.
Limited Rating for Specialized Service	**Specialized Service Rating**
For example, landing gear components; nondestructive inspection, testing, and processing; emergency equipment; aircraft fabric work; and any other specialized service the Administrator finds appropriate for this rating.	For any specialized service the Administrator finds appropriate for this rating.
Limited Rating	**Limited Rating**
For airframes; engines; propellers; instruments; radio equipment; accessories; landing gear; components; floats; nondestructive inspection, testing, and processing; emergency equipment; rotor blades by make and model; aircraft fabric work; and other purposes.	For aircraft, airframes, powerplants, propellers, avionics, computer systems, instruments, and accessories by make and model.

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